

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ROBERT STOUD,	:	
	:	
Plaintiff	:	CIVIL ACTION - LAW
	:	
v.	:	
	:	
SUSQUEHANNA COUNTY,	:	NO. 3:17-CV-2183-MEM
	:	
Defendant	:	

BRIEF IN OPPOSITION PLAINTIFF’S MOTION IN LIMINE TO BAR
DEFENDANT FROM SUBMITTING ANY EVIDENCE OF PROPER HUMAN
RESOURCES PROCEDURES

Defendants, Susquehanna County, through its Attorneys, Kreder Brooks
Hailstone LLP, hereby file the following Brief in Opposition to Plaintiff’s Motion
in Limine:

Argument

Plaintiff seeks, without any legal support, to prohibit Defendant from
discussing “proper human resources/management procedures” because Defendant
made the decision to not engage an expert. Defendant has filed a Motion in Limine
regarding the report submitted by Plaintiff’s “expert”.

Defendant can not be barred from discussions of its policies and procedures.
Additionally, if Plaintiff’s expert is allowed to provide testimony, Defendant has

the right to question her definition of proper human resources/management procedures.

WHEREFORE, the Defendant, Susquehanna County, respectfully request the Court to issue an Order denying Plaintiff's Motion in Limine.

Respectfully submitted,

KREDER BROOKS HAILSTONE LLP

220 Penn Avenue, Suite 200
Scranton, PA 18503
(570) 346-7922

By /s/ A. James Hailstone
A. James Hailstone
Attorney I.D. #80055
Attorneys for Susquehanna County

CERTIFICATE OF SERVICE

AND NOW, this 28th day of August, 2020, A. James Hailstone, a member of the firm of Kreder Brooks Hailstone LLP, electronically filed the foregoing Brief in Opposition with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address(es):

Gerard M. Karam, Esquire
Mazzoni, Karam, Petorak & Valvano
321 Spruce Street, Suite 201
Scranton, PA 18503
570-348-0776
gkaram18@msn.com
ATTORNEYS FOR PLAINTIFF

/s/ A. James Hailstone

A. James Hailstone
Attorney I.D. #80055
Attorneys for Defendant